

- D. Barry - 6/25/80

MICHIGAN DEPARTMENT OF NATURAL RESOURCES

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INTEROFFICE COMMUNICATION

JUN 25 1980

June 25, 1980

Groundwater Comp, WQD

TO: Andy Hogarth, Chief
Groundwater Compliance and Special Studies Section

FROM: Larry Fink
Office of Toxic Materials Control

SUBJECT: Chemical Waste Landfill
BASF Wyandotte Corporation (BWC) - Wyandotte, Michigan

Phone report. Larry needs to understand the limitations of our resources. How to proceed.

not, so a recommendation of them together.

Attached find a photocopy of a memorandum to John Bohunsky dated March 26, 1980 reiterating concerns expressed in a November 15, 1979 memo (copy attached) over the potential contamination of groundwaters beneath the BASF Wyandotte Corporation North and South Works sites resulting from past toxic materials management practices. Also attached is a photocopy of a hand written copy of a memorandum in the Water Quality Division Regular Files describing a spill of 15,000 gallons of styrene in the vicinity of a landfill that was used by BWC to deposit wastes and other materials in previous years. I believe this evidence strongly suggests the potential for groundwater contamination as a result of past toxic materials management practices at BWC.

Please evaluate this recommendation, and if appropriate, please include the BWC North and South Works sites in a survey to be conducted by Ground Waters Task Force. ||

Should you have any questions concerning this recommendation, please feel free to contact me.

tkr

Attachments

cc: J. Bohunsky
K. Zollner, Jr.
R. Schrameck
OTMC Files/J. Grant



"North works" site a suspected problem

March 26, 1980

TO: John Dohunsky, Chief, Field Operations, Water Quality Division

FROM: Larry Fink, Office of Toxic Materials Control
Environmental Services Division

SUBJECT: NPDES Discharge Permit Application Review
BASF Wyandotte Corporation (BWC) - Wyandotte, Michigan

In my November 15, 1979, memorandum to Karl Zollner, Jr. and Roy Schrameck, we requested that BWC submit information locating and characterizing existing and historical land disposal sites and spill sites on BWC property. This information was to be used to identify and quantify toxic contaminants of groundwater entering the Detroit River via groundwater recharge so as to be able to calculate the toxic materials pounds per day loadings contribution of BWC-contaminated groundwaters to the total toxic materials loadings from BWC to the Detroit River.

Of particular concern is a documented loss of approximately 15,000 gallons of styrene in 1975 in the vicinity of a landfill that was used by BWC to deposit wastes and other materials in previous years. Since styrene is presently discharged from BWC North Works outfalls, the contribution of BWC nonpoint sources to the loading of styrene must be considered when determining the maximum loading of styrene from controllable point sources to be allowed under the reissued NPDES permits no. MI 0000540 and MI 0000566.

Since this information is critical to our review of the BASF Wyandotte Corporation's NPDES permits, we would appreciate your assistance in obtaining the necessary data from the facility.

An acknowledgement of this request at your earliest convenience is appreciated. Should you have any questions, please feel free to contact me.

clp

cc: R. Powers
G. Saalfeld
R. Hobria

To: S. H. Freeman

From: Gary Gorton, Law Clerk

DATE: March 5, 1976

RE: BASF - Wyandotte Chemical Corp.

PEAS # 1072-75

The above loss was of ~ 15,000 gallons of styrene from a storage tank located on the property of BASF Corporation in Wyandotte, Mi. It appears that the loss was the result of slow leakage over the course of about one month prior to its discovery on August 27, 1975.

A portion of the styrene has been recovered and test wells have been dug to insure that the substance will not move through the ground to the Detroit River. Also, there is no mention in the reports of any environmental damage.

A major problem as to whether or not legal action may be taken is that it is not known if the styrene got into the ground waters of the area. According to Gary Barker of WRC staff, the site of the storage tank is on a land fill that was used by the BWC to deposit waste and other materials a number of years ago. Because of this, there may be pockets of water located within the landfill that the styrene seeped

into but these pockets would probably, not meet the definition of "waters of the state" so as to preclude any action under the WRA. ∴, Mr. Barker stated that the WRC staff cannot tell with any certainty whether or not the styrene got into the ground waters.

Since the subs did not migrate into DR or any other waterway as evidenced by the test wells and since it is not known whether the styrene got into the ground waters, it is my recomm. that legal action not be taken.